

QUARTERLY REPORT
To The
U. S. ENVIRONMENTAL PROTECTION AGENCY

GOULD, INC.
PERIOD ENDING June 30, 2006

PROJECT SUMMARY

Management Assistance Project
Cooperative Agreement No. V-000718-03
Gould, Inc./NL Industries
DEQ Project Manager: Jill Kiernan

PROJECT REPORTING DATE

April 1 to June 30, 2006.

ACCOMPLISHMENTS

TASK 1 - PARTICIPATE IN MEETINGS AND BRIEFINGS: No RP/EPA meetings or conference calls regarding the operation and maintenance (O&M) of the amended remedy were held this quarter.

TASK 2 - DOCUMENT REVIEW: Conducted reviews of monitoring reports, progress reports, and inspection reports.

TASK 3 - COORDINATE ISSUES RELATED TO GOULD CLEANUP ACTIVITIES AND DEQ-LEAD RI/FS/REMOVAL ACTIVITIES AT ADJACENT RHONE-POULENC SITE:

No coordination activities this quarter regarding Rhone-Poulenc site. Coordinated with other DEQ staff and public regarding Portland Harbor Superfund site issues associated with the Gould site.

TASK 4 – SITE MONITORING: Coordinated with RP consultant regarding the quarterly site inspection and monitoring event.

TASK 5 - PERFORM COMMUNITY RELATIONS ACTIVITIES: Issued status reports and responded to public inquiries and file review requests.

PROBLEMS ENCOUNTERED

No problems were encountered during this period.

PROJECT ISSUE SUMMARY

EPA issued a Record of Decision (ROD) for the Soils Operable Unit at the site in March 1988, requiring the excavation of all buried battery casings and matte, excavation and treatment of contaminated soils, sediment, and matte to reduce the mobility of lead, and separation and recycling of battery casings components. Remedial actions as required by the ROD were partially completed from June 1993 to May 1994. During this time, 24,000 tons of battery casings were excavated and processed through the separation/treatment plant, with 244 tons of

plastic and 88 tons of lead recycled. Contaminated soils and matte were stabilized, producing 20,000 cubic yard blocks which were stored on the site.

Several problems were encountered during the first year of operation of the battery separation and treatment process. Although several modifications were made to the process, it was determined that the process was no longer efficient or cost-effective and that only limited quantities of processed materials were recyclable. Additionally, the volumes of battery casings to be excavated and processed were overestimated in the ROD. In May 1994, EPA allowed the PRPs to suspend operations and evaluate alternative remedial actions.

After completing a focused feasibility study, the PRPs submitted a proposed alternative cleanup plan to EPA in October 1995. EPA prepared a Proposed ROD Amendment for public comment that described EPA's preferred alternative for completing the cleanup of the soils operable unit. The Amended ROD was issued on June 3, 1997.

Major components of the Amended ROD included construction of an 8.5 acre on-site containment facility (OCF) to RCRA (40CFR 264, Subpart N) standards, excavation of remaining battery casings on the Gould site, excavation of contaminated sediment in East Doane Lake, stabilization of lead fines, consolidation of approximately 60,000 cubic yards of excavated and previously stockpiled material in the OCF, filling of East Doane Lake, wetlands mitigation measures institutional controls, and groundwater monitoring.

EPA issued a Unilateral Order to the RP Group in July 1997, requiring the design and implementation of an early remedial action for the East Doane Lake portion of the remedy on a time-critical path. EPA filed a Consent Decree in March 1998 addressing the design and implementation of the amended remedy. The implementation of the early remedial action for East Doane Lake was conducted from June to October 1998. Approximately 8,000 cubic yards of contaminated sediment were excavated from East Doane Lake and stockpiled on-site for subsequent disposal in the OCF. The excavation on the Gould property was then backfilled with clean fill to grade.

Remedial design activities related to OCF construction were completed in April 1999. Construction activities were initiated in June 1999 and continued until early December 1999, when unfavorable weather precluded completion of the OCF. Construction of the OCF was approximately 90% complete at that time. Construction resumed in May 2000 and was completed in September 2000. The operation and maintenance of the OCF, including periodic inspections and groundwater monitoring, is now ongoing.

ACTIONS NEXT QUARTER

- A. Coordinate with EPA on review and approval of O&M documents.
- B. Participate in periodic site inspections.
- C. Coordinate with EPA on Rhone-Poulenc remedial investigation and remedial action issues. Coordinate on Portland Harbor Superfund site issues.
- D. Review contractor submittals, status reports, and inspection reports.

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